

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)
)
Plaintiff,)
)
v.) No. 4:20-CR-743 SEP JMB
)
JEREMIAH COUCH)
)
Defendant.)

MOTION TO APPOINT NEW DEFENSE COUNSEL

Defendant JEREMIAH COUCH, through his attorney, Charles J. Banks, Assistant Federal Public Defender, hereby moves this Honorable Court to appoint a different lawyer to represent him in this matter. In support, the defense states the following:

1. Mr. Couch has informed defense counsel that he wants a different lawyer to represent him in this case.
2. Despite undersigned counsel's best efforts to salvage the attorney-client relationship, Mr. Couch remains resolute in his desire for a different attorney.
3. Consequently, undersigned counsel asks for leave to withdraw from representing the defendant and for appointment of a qualified attorney from the CJA Panel.

4. Appointment of replacement counsel is necessary to protect Mr. Couch's rights to due process, equal protection, and the effective assistance of counsel, as guaranteed by the 5th and 6th Amendments to the United States Constitution.

WHEREFORE Mr. Couch respectfully requests appointment of qualified counsel from the CJA Panel and for the withdrawal of undersigned counsel from the case.

Respectfully submitted,

/s/Charles J. Banks
CHARLES J. BANKS, #60027MO
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Jennifer Szczucinski, Assistant United States Attorney.

/s/Charles J. Banks
CHARLES J. BANKS, #60027MO
Assistant Federal Public Defender